

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE **Patricia A. Brown, aka**
Patricia A. Tucker
Debtor

Chapter 13
: **BANKRUPTCY NO. 22-11904-amc**

NOTICE OF MOTION, RESPONSE
DEADLINE AND HEARING DATE

Windrush Homeowners Association, has filed a Motion for Relief from the Automatic Stay with the Court for modification of the Automatic Stay under §362 with respect to its lien on your property, and your failure to make post petition payments.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before **May 10, 2023**, you or your attorney must do all of the following:

(a) file an answer explaining your position at Clerk of Court, US Bankruptcy Court, EDPA, 900 Market Street, Philadelphia, PA 19107-4299. If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney, Stefan Richter, Esq., Clemons Richter & Reiss, P.C., 2003 South Easton Road, Suite 300, Doylestown, PA 18901.

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested

in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan, on **May 16, 2023 at 11:00 a.m.** in Courtroom 4 United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107-4299.

4. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Clemons Richter & Reiss, P.C.

A handwritten signature in blue ink, appearing to read "Stefan Richter", is positioned above a horizontal line.

Stefan Richter, Esquire
Attorney for Movant

Dated: April 25, 2023